

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re **Shaun Shuford**

Debtor(s)

Case No. **19-15551**
Chapter **13**

**DEBTOR, SHAUN SHUFORD'S RESPONSE AND OPPOSITION TO
MOTION FOR RELIEF FILED BY NATIONSTAR MORTGAGE, LLC D/B/A MR. COOPER**

Debtor, Shaun Shuford, by and through his counsel, Tova Weiss, does hereby respond to and oppose the Motion for Relief filed by Nationstar Mortgage, LLC D/B/A Mr. Cooper and states as follows:

- 1.-5. Admitted.
- 6.-7. Admitted in part, Denied in part. It is admitted that Debtor owed post-petition payments, Debtor intends on making the post-petition payments through either a Stipulation or Loan Modification approval.
- 8.-9. Denied. Debtor is not certain as to the exact amounts he owes in post-petition payments or in plan payments.
- 10.-11. Denied. It is denied that Movant is entitled to relief for cause.

WHEREFORE, Debtor respectfully requests that this Honorable Court Deny the Motion for Relief filed by Nationstar Mortgage, LLC D/B/A Mr. Cooper.

Respectfully submitted,

/s/Tova Weiss
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Date: 1/2/2020